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June 12, 2023

By ECF

The Honorable John G. Koeltl
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, New York 10007-1312

Re: *Roche Cyrulnik Freedman LLP v. Cyrulnik*, Case No. 1:21-cv-01746 (JGK)

Dear Judge Koeltl:

Pursuant to Rule 6.A.2 of Your Honor's Individual Practices, I write on behalf of Defendant/Counterclaim-Plaintiff Jason Cyrulnik ("Cyrulnik") to request permission to file under temporary seal certain documents in support of Cyrulnik's motion for summary judgment, which is being filed concurrently herewith.

Cyrulnik intends to reference and/or exhibit certain documents and information Plaintiff/Counterclaim-Defendants contend are confidential and warrant sealing.

Although Cyrulnik does not believe the materials warrant sealing, and intends to object to any motion seeking permanent sealing, we make this request in the interest of affording Plaintiff/Counterclaim-Defendants the opportunity to file a motion for permanent sealing, to which motion Cyrulnik will respond in due course. In accordance with Rule 6.A.2 of your Honor's Individual Practices, we have notified Plaintiff/Counterclaim-Defendants of its obligation to file a letter within three days explaining the need to seal the materials.

We thank the Court for its consideration of this request.

Respectfully,

/s/ Marc E. Kasowitz
Marc E. Kasowitz

cc: Counsel of Record (via ECF)